IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

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UNITED STATES OF AMERICA)	DEBRA P. HACKETT, CLK U.S. DISTRICT COURT
v.)	CR. NO. 1:21 (2345 Etm 5mb ALA [18 U.S.C. § 2251(a) and (e)]
STEVEN ANTHONY JACKSON)	[16 0.5.0. § 2251(a) and (c)]
)	INDICTMENT

The Grand Jury charges:

COUNT 1 (Sexual Exploitation of a Child)

During 2019, in Geneva County within the Middle District of Alabama, and elsewhere, the defendant,

STEVEN ANTHONY JACKSON,

did employ or use, Child Victim 1 (CV1), an approximately 18-month-old girl, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; or using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; or the visual depiction was transported using any means and facility of interstate and foreign commerce; or the visual depiction was transported in and affecting interstate and foreign commerce; in violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 2 (Sexual Exploitation of a Child)

On or about the Fall or Winter of 2019, in Geneva County within the Middle District of Alabama, and elsewhere, the defendant,

STEVEN ANTHONY JACKSON,

did employ, use, persuade, induce, entice, and coerce any minor, Child Victim 2 (CV2), a 12-year-old girl, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported in and affecting interstate and foreign commerce; or using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer; or the visual depiction was transported using any means and facility of interstate and foreign commerce; or the visual depiction was transported in and affecting interstate and foreign commerce; in violation of Title 18, United States Code, Section 2251(a) and (e).

FORFEITURE ALLEGATION

- A. The allegations contained in Counts 1 and 2 of this Indictment are incorporated by reference for alleging forfeitures pursuant to Title 18, United States Code, Section 2253.
- B. Upon conviction for the violations of Title 18, United States Code,

 Section 2251(a) and (e), as alleged in Counts 1 and 2 of this Indictment, the defendant,

 STEVEN ANTHONY JACKSON,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253:

- (1) any visual depiction described in Title 18, United States Code,
 Sections 2251, 2251A, or 2252, or any book, magazine, periodical, film, videotape, or other
 matter which contains any such visual depiction, which was produced, transported, mailed,
 shipped or received in violation of Title 18, United States Code, Chapter 110;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense; and,

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense.

Such property includes, but is not limited to:

- (a) an LG Solo, Model L423DL, cellular telephone, bearing serial number 905HUKB0086733; and
- (b) an Alcatel TCL LX, Model A502DL, cellular telephone, bearing serial number 015423002488226.
- C. If any of the property described above, as a result of any act or omission of the defendant:
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or
 - (5) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to seek an order of this Court forfeiting any other property of said defendant up to the value of any property described in paragraph B above.

All pursuant to Title 18, United Sates Code, Section 2253.

A TRUE BILL:

Foreperso

SANDRA J. STEWART

ACTING UNITED STATES ATTORNEY

J. Patrick Lamb

Assistant United States Attorney

Gregory O. Griffin

Assistant United States Attorney